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8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$23,505.00 IN  
U.S. CURRENCY,

15 Defendant.

2:24-MC-00025-DJC-CKD

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

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17 It is hereby stipulated by and between the United States of America and potential claimant Gal  
18 Yifrach (“claimant”), by and through their respective counsel, as follows:

19 1. On or about October 26, 2023, claimant filed a claim in the administrative forfeiture  
20 proceeding with the Federal Bureau of Investigation with respect to the Approximately \$23,505.00 in  
21 U.S. Currency (hereafter “defendant currency”), which was seized on or about July 27, 2023.

22 2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required  
23 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a  
24 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant  
25 has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
currency is subject to forfeiture within ninety days after a claim has been filed in the administrative

forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties. That deadline was January 24, 2024.

3       4. By *Amended* Stipulation and Order filed January 26, 2024, the parties stipulated to extend  
4 to April 23, 2024, the time in which the United States is required to file a civil complaint for forfeiture  
5 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
6 subject to forfeiture.

7       5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
8 to June 21, 2024, the time in which the United States is required to file a civil complaint for forfeiture  
9 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
10 subject to forfeiture.

11       6. Accordingly, the parties agree that the deadline by which the United States shall be  
12 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
13 alleging that the defendant currency is subject to forfeiture shall be extended to June 21, 2024.

14 | Dated: 4/22/2024

**PHILLIP A. TALBERT**  
United States Attorney

By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

19 | Dated: 4/22/2024

/s/ Richard M. Barnett  
RICHARD M. BARNETT  
Attorney for potential claimant  
Gal Yifrach

(Signature authorized by email)

## IT IS SO ORDERED.

Dated: April 22, 2024

/s/ Daniel J. Calabretta

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THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE